

In the Matter of )  
 )  
Review of the Commission's )  
Broadcast and Cable Equal ) MM Docket No. 98-204  
Employment Opportunity Rules and )  
Policies )  
and )  
Termination of the EEO ) MM Docket No. 96-16  
Streamlining Proceeding )

TO THE COMMISSION

**COMMENTS OF EEO SUPPORTERS**

**VOLUME IV:**

**DISCUSSION OF WITNESSES' STATEMENTS**

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National Association of Black  
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National Association for the  
Advancement of Colored People  
National Bar Association  
National Council of La Raza  
National Hispanic Media Coalition,  
including its Los Angeles, New  
York, Chicago, Tucson,  
Albuquerque, Phoenix and San  
Antonio Chapters  
National Latino Telecommunications  
Taskforce  
National Urban League  
People for the American Way  
Project on Media Ownership  
Puerto Rican Legal Defense and  
Education Fund  
Rainbow/PUSH Coalition  
Telecommunications Advocacy  
Project  
Telecommunications Research and  
Action Center  
Women's Institute for Freedom of  
the Press

[open for additional sign-ons]

March 22, 1999

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**INTRODUCTION TO VOLUME IV**

This Volume of our Comments organizes, annotates and analyzes the 22 witness declarations contained in Volume III, which we have filed contemporaneously.

The witnesses are:

1. Alfredo Alonso, President and CEO, Mega Communications, Inc., Sacramento, CA
2. Thomas Castro, President, El Dorado Communications Corp., Houston, TX
3. W. Don Cornwell, Chairman and CEO, Granite Broadcasting Corporation, New York, NY
4. Veronica Cruz, Senior Accountant with a major telecommunications company in Los Angeles, CA
5. Jannette Dates, Dean, School of Communications, Howard University, Washington, DC
6. Willie D. Davis, President, All Pro Broadcasting, Inc., Los Angeles, CA
7. William H. Dilday, President, Kerimax Communications, Inc., Jackson, MS; first Black General Manager of an American television station - WLBT-TV, Jackson, in 1969
8. Serena Ferguson Mann, General Manager, The Flagship Channel, University of Maryland, College Park, MD
9. Skip Finley, developer of the "Answers, Solutions" Executive Development system, Washington, DC; former Chairman, Radio Advertising Bureau; former CEO/COO, American Urban Radio Networks
10. Ragan A. Henry, President, MediaComm National, Inc., Philadelphia, PA; past President, National Association of Black Owned Broadcasters; past President, U.S. Radio, Inc.
11. Cathy Hughes, Chairperson and Founder, Radio One, Inc., Lanham, MD
12. Chesley Maddox-Dorsey, President, Access.1 Communications Corp., parent of National Black Network and WWRL(AM), New York, NY
13. Joe Madison, Program Director, WOL(AM), Lanham, MD; talk show host; former Director of Voting Rights, NAACP; member, NAACP National Board of Directors

14. Paula Madison, Vice President and News Director, WNBC-TV, New York, NY
15. Sharon Pearl Murphy, Executive Director, African American Media Incubator, Washington, D.C.
16. Eduardo Peña, communications counsel for LULAC and its past National President; member, LULAC Board of Directors, Washington, DC
17. Russell Perry, CEO, Perry Publishing and Broadcasting Company, Inc., Oklahoma City, OK
18. Daniel Schecter, co-founder and Vice President/ Executive Producer, Globalvision, Inc., New York, NY
19. Rokia Smith, Research Analyst, WNBC-TV, New York, NY
20. Jeffrey H. Smulyan, Chairman of the Board, Emmis Communications Corporation, Indianapolis, IN
21. Dennis Swanson, President, WNBC-TV, New York, IN
22. James L. Winston, Executive Director and General Counsel, National Association of Black Owned Broadcasters, Washington, DC

Each of these witnesses is a distinguished broadcast industry leader with years of experience with the FCC's EEO policies. Some have mentored hundreds of minorities and women. Collectively, they possess vast knowledge and experience in managing diversity in the workplace and years of observation of how diversity in the workplace affects programming. Their contributions to this proceeding are entitled to considerable weight.

We have organized their testimony below by subject matter -- allowing the declarations to speak for themselves.

\* \* \* \* \*

I. Why EEO rules and policies are good for broadcasting

Cornwell:

EEO regulations serve as a strong reminder that broadcasters must treat employees fairly and make an effort to be inclusive in hiring. In addition to the fact that inclusion in hiring is the right thing to do, it is also good business.

Ferguson:

The EEO policy works to influence portrayal, content and frequency of issues of concern to broad sections of the viewing public. The EEO steps in as a reminder to be inclusive to all members of society. ... I think the EEO policy is still needed to make further inroads in equalizing opportunities and to keep the pressure on broadcasters. EEO is like a poke, a prod, and a wake up call. EEO serves as a reminder to be inclusive to all members of society. We have not achieved the equality everyone hoped for when the program was set up. Most of the problems that prompted the EEO regulation still exist.

Dilday:

The EEO rule is a necessary component of broadcaster's public interest obligations and is needed in order to maintain and increase the capacity of members of all segments of broadcasting audiences to gain representation on the public airwaves.

Alonso:

I believe that the FCC's EEO program provides opportunities to minorities where they wouldn't otherwise have been extended. The main reason for EEO policies is to recognize that there is talent within minority communities available to work in the broadcast media business. FCC EEO enforcement would facilitate a minority individual to learn more about the industry.

Davis:

Everytime a broadcaster ponders the importance of EEO regulations, that broadcaster knows that they are held to some particular requirement of representation of the market place. The value received from EEO enforcement is worth what must be endured to make sure you have employed within your station, a reflection of the audience and community you serve.

Maddox-Dorsey:

An effective EEO program is crucial in order to to increase diversity in radio stations. The FCC EEO policies are very important in creating a more sensitized environment....The wider selection and the larger the number of applicants one has to choose from, the better chance one has of getting a high quality employee.

Perry:

EEO provides opportunity for all parts of society so that all can have a fair and equal opportunity in the media.

Dates:

The FCC's EEO rule had been the single most critical factor in promoting equal employment opportunity for people in the broadcasting industry.

Peña:

Many Hispanics employed in broadcasting, using access and interaction they enjoy with other broadcast staff members are able to present and question stereotypes and motivate their employers to present their views. That is why the EEO Rule is most needed. The EEO Rule's main focus has been requiring broadcasters to notify community groups whenever jobs are open. The EEO Rule also assists broadcasters in securing a steady flow of qualified job applicants.

Henry:

A good thing about FCC EEOC policies is that they put Blacks and other minorities in the informal discussion, occurring within most stations, that leads to a point of view.

Cruz:

EEO directly and indirectly affects the programming content offered by broadcasters. EEO is a crucial aspect of broadcaster's public interest obligation and must not be reduced or weakened. It is important to have the regulations so that there is a little bit more of an equal spread of ethnic viewpoints.

J. Madison:

EEO enforcement can ensure that minorities and women are not tracked into positions which give no opportunity to advance into upper echelon positions.

Castro:

The FCC regulatory program is still necessary because this is an industry that is rather insular and people hire those they know and have worked with in the past and trust....The only real way to force change is to monitor the progress of broadcast owners and managers to integrate their workforce....So enforcement of FCC regulations is essential and it shouldn't be just paperwork to be filled out, but must accompany strong standards....Having an EEO program would allow a broadcaster, without a perfect or diverse human resource network, to do outreach and bring more talent to their company. An effective EEO program could create access to an untapped pool of talent....FCC EEO policies are needed to level the playing field.

II. Why the FCC has a role to play in EEO enforcement

Dilday:

I have also noticed that there is a drastic difference in the job conditions for minorities when stations have no working EEO program in force. Without the EEO program people tend not to look for minorities or women when they make hiring decisions. Therefore minorities and women have far less chances of gaining employment in broadcasting and of bringing the interaction and tolerance that makes for a better station and a better community.

Alonso:

I think that minorities are looked at as "just" on-air talent. A minority job applicant is presumed qualified to only serve as a personality, such as a disk jockey, morning drive or afternoon drive person. Absent FCC EEO involvement, I just don't see broadcasters taking on the responsibility of diversity and minority involvement at all levels in the industry, without pressure from the FCC to accomplish such goals.

Finley:

There doesn't seem to be any history to suggest that goodwill or good intentions will have a democratic or favorable result in the absence of equal employment opportunity rules governing hiring and promotion.

Maddox-Dorsey:

I shudder to think where the numbers of job applicants and actual minorities working in the industry would be without any concerted effort being made.

Hughes:

Historically, minorities have been the last to find out about opportunities absent a mandate that requires broadcasters to make job information available. Without EEO, it will be as it was 25 to 30 years ago when minorities applied for jobs that had already been filled....Once it became so blatantly obvious that there were only a handful of minorities at the management level, you could quantify the reality of job disparity.



Pena:

As the EEOC's past Director of Compliance (1970-1979), I know that the absence of any meaningful EEO compliance data renders it virtually impossible for a civil rights enforcement body to identify likely discriminators and hold them accountable.

J. Madison:

In some firms I knew of which lacked compliance, there were no African-American males, and women experienced the dreaded glass ceiling.

Castro:

I have found that people who work within the broadcast stations without effective EEO programs have had fewer opportunities and are less satisfied.

III. Why EEO is essential to promote minority ownership

Alonso:

In addition to a solid business education and working, on-the-job training is needed to develop an owner's skill in hiring, handling a media campaign and programming. It is very important to financial institutions that a prospective owner have broadcasting experience....Lack of FCC EEO enforcement will definitely hurt minorities' chances to get into media ownership, because they may not be able to get proper opportunities for networking and on-the-job training. FCC EEO enforcement would facilitate a minority individual to learn more about the industry.

Cornwell:

Securing capital and securing financing is still the main problem for minority broadcasters. They're hasn't been a level playing field which hampers minority owners from being competitive. The more impressive a track record, the more comfortable climate you could create within the financial community. The group becomes very small when you are trying to find enough minorities with a sufficient background in broadcasting.

Maddox-Dorsey:

It is crucial to financial institutions that broadcast owners have broadcast operating experience. The lack of FCC EEO enforcement could be perceived as hampering opportunities for potential minority owners to gain necessary on-the-job experience. The lack of opportunities to meet and mingle with potential station sellers and develop mentors could impede their ability to find or even recognize qualified job applicants to staff their facilities when they are successful in the ownership realm. To be an effective broadcast owner, you have to have a blend of skills that you cannot just learn in a textbook.

Hughes:

Opportunity, finance, and personnel management are needed for effective broadcast facility ownership. You've got to be able to really run your business.

Henry:

If an owner is to succeed, the owner must have an understanding of how a radio station works as an entity and how it relates to the community it serves. Getting the station is only part of what ownership is about. You have to succeed once you get your station. You have to meet your debt service, you have to keep your employees happy to achieve high ratings for good economic results.

Winston:

If the Commission does not continue to require nonminority owned stations to recruit, train and promote minorities, there will be an inadequate pool of experienced media professionals to move up into key management positions at our stations or to become owners themselves.

Castro:

If an owner does not have on-the-job training and opportunities, you will not make it. Without broadcast management experience, you will never get a penny from the banks to purchase a station, unless you are very wealthy and have sufficient collateral. The greatest percentages of minorities have to become managers, and thus qualifying later to become owners. Minority owners would disappear if FCC EEO enforcement disappears.

IV. How employment diversity affects program diversity

Cornwell:

In advertising supported media such as local television where the size of the audience is critical, managers must be sure to reach out to as large an audience as possible. That clearly argues for an inclusive approach in programming as well as employment. One side benefit of employment diversity may be content diversity since the interest an individual brings to the job will undoubtedly be reflected in the approach taken to a story or a project. In our experience, this is reflected in one of our news anchor's in Peoria-an African-American who consistently finds a way to introduce that largely Caucasian community to more about the relatively small African-American community in Central Illinois than it might have learned otherwise. It can also include the more dramatic efforts of Bob Johnson, major shareholder of Black Entertainment Television, deciding to take an active role in urging his audience to vote in recent elections. All of these actions result from the personal focus of an individual. All employees of whatever racial background make such choices every day and to, the extent we have diversity in the workplace, we are likely to see that diversity of experience reflected in the programming choices of stations.

Dilday:

I wanted my staff to be reflective of the community as a whole. I knew that it was just good business to employ the whole community in your workforce. Due to the nature of broadcasting, the presence of minorities and women on staffs positively influences the content, frequency and tone of programming on minority issues. This effect is partially attributable to the dynamic of the interaction: the more you and I interact, the more we learn about each other and the more tolerant we are of each other's concerns, desires, wants, needs and community. An intergrated workforce also works in more direct ways by increasing the availablity of employees who can cover minority issues, know what questions to ask, and put a much more balanced story on the air.

Hughes:

I want diversity on my staff because I want my staff to reflect my listening audience. I would want to make certain that my company followed a policy that made it possible for the best available talent to have an equal and fair opportunity in the work place. The interaction of a diverse staff within a broadcast facility would cause a sensitizing process to take place. When you have an integrated staff, race and gender, there is a sensitizing process that takes place.

Ferguson-Mann:

If you have a group that is supposed to be covering the community, and the group itself is indicative of what the community looks like, then they are able to portray the community perspective. They are more knowledgeable about the different points of view and different perspective. It affects their coverage regarding the community. In other situations, I know that my presence on the production staff of the Washington bureau of a large network directly influenced programming decisions made by my employers.

Pena:

The FCC's EEO program was designed to promote diversity of voices by insuring that the staffs of broadcasting stations are integrated. Employee interactions are the tributaries to the stream of ideas powering the information business. A greater diversity of viewpoints, and particularly the addition of minority viewpoints, strengthens our nation's public discourse.

Smulyan:

We are all a product of all our experiences, and therefore interactions with minorities on the job do influence the approach to programming decisions.

Cruz:

A broadcaster which has EEO obligations and hires people who understand different perspectives is a little more attuned to minority concerns. As a result, the broadcaster can attract more viewership. It will have a tendency to grab a bit more of the market than a generic station; it will be able to be a little bit more successful than the average station. ... When one broadcaster I worked for started to hire more Hispanic field reporters there was a noticeable difference. The reporting on some of the stories gained more depth and objectivity.

J. Madison:

In terms of the impact on programming content and portrayal of minorities, a fairly well integrated firm has a positive impact on the company's relationship to the community. A well mixed workforce therefore enhances the company's relationship to the community to which it is licensed and enhances program content. The program content gains a certain cultural and social awareness that programming by a homogenous broadcasting workforce usually does not have. Integration works at all levels, although interaction among programming staff is more essential.

Schechter:

White broadcasters that interact with minority staff members have a greater tendency than not to cover issues affecting minority communities.

Smith:

Programmers are more sensitive to minority views and issues when they are in direct contact with colleagues who represent these groups. I believe that it is important for the decision-makers to come from a diverse pool to help ensure that issues of race are properly addressed on the air.

Swanson:

We are all products of our environment and our attitudes and opinions reflect that environment. Hopefully, a station's workforce will reflect the population it is servicing. I believe this is a "win-win" situation because our business is determined by ratings and a broader audience should translate to financial success....Whether a station's employee diversity will have an impact on the stations's programming and operations ultimately will depend on upper level management's ability to take input from a wide variety of sources within his or her broadcast operation....I believe that having a diversified staff at the department head level has helped WNBC be more conscientious towards a wider range of programming and news views.

P. Madison:

Diversity plays an important role in how program decisions are made at News Channel 4....At every point in this process, there is a diverse group of people making the decisions, and the role of race in any of our stories is discussed regularly and openly throughout our staff.

Castro:

The portrayal of issues, by the media, is directly related to who is sitting around the table deciding what to cover and how to cover it. Different people bring different perspectives to the table, the good and the bad of our life experiences....There is a direct linkage between integrating the work force and the product that goes on the air.

V. **How EEO helps build broadcasting careers -- from entry level positions to management to ownership**

Ferguson-Mann:

I can honestly assert that I would not be where I am today without the EEO program. If not for EEO, I would never have been aware of the opportunities available in broadcasting. Walt Disney came to my campus and actively recruited students.... The EEO policy opened the door for minorities' access to entry-level positions. These sectors (lower job categories or smaller stations) are the chief training ground in the broadcasting industry.

Dilday:

When I was hired as the first black manager for a TV station in the country, here in Jackson, Mississippi, I'm quite certain that it was due to the FCC's EEO policy. I didn't seek my employment. The station's owner heard about me and sought me out.

Hughes:

Had there not been a move to get women and minorities into management, I doubt very seriously I would have gotten that opportunity if it had not been the burning issue of the day.

Castro:

FCC EEO regulations have impacted my career. I would not have been in this industry if the government did not put out the welcome mat by specifically stating that minorities could, should and will own stations and hold jobs in the industry.

Alonso:

I started my career in broadcasting in an entry-level position and I know of many others similarly situated. These broadcasters, starting in entry-level positions, represent a significant percentage of broadcasters who are now in high-level positions.

Cornwell:

Virtually the entire top operating managers in my company got their start through an entry-level position. Thus, we have attempted from the very beginning of the company, to provide such opportunities to aspiring but inexperienced broadcasters. Thus, we believe that to the extent EEO policies motivate companies to support such intern and entry level positions, diversity will increase in the industry over time.

Davis:

I know a few managers in broadcasting who started their careers in entry-level positions, with some spring-boarding from my company, All Pro Broadcasting. One of my general managers and I recently recounted the number of people, who had come through All Pro, who are now programming, in sales, and indeed, serving as general managers. I can say that I am proud of the upward career mobility of employees within my company.

Maddox-Dorsey:

Most of the non-minority male broadcast executives journalists or personalities I have worked with got their start in entry-level positions. Generally, they developed a good working relationship with their manager who in many cases became their mentor. This relationship facilitated their grooming and development and very likely led to them learning their contacts about the "better" career move.

Dates:

Most Black college graduates begin their professional careers at "small" stations, such as those with fewer than ten full time employees, or in entry-level positions at larger stations. We repeatedly emphasize to our students that they must start "small" and work their way up.

Murphy:

We advise our students that they must be willing to sacrifice and work at "small" stations--if that's where the jobs are. The proposed exemption would foreclose a primary source of entry-level employment opportunities

Henry:

A number of people I know, who are now in management positions in the media, actually started out in entry-level positions. They sort of grew into the higher positions because there is nothing magic about any of the management-level positions. If given the opportunity, any reasonably intelligent person, with a pleasing personality, can learn to perform almost any job in broadcasting.

Winston:

Black owned stations are frequently the first point of entry for African-Americans and other minority persons seeking to break into broadcasting, but we cannot hire and train all of the minorities seeking to enter this business.





J. Madison:

Broadcasting professionals tend to start at the very bottom small stations. Very few people start at the top or in the middle. If Hispanic or African-Americans study and live in states such as Iowa, where there are few black owned or Hispanic stations, their only resort is to seek employment with smaller, usually family owned stations.

Smith:

Throughout my time in the media industry (seven years thus far), it was my understanding that most individuals, including myself, must start from "the bottom", and work their way up the proverbial ladder. Such was the case with General Manager and President of WNBC, Dennis Swanson. The Director of the Foundation for which I served as an intern, Betty Elam, has also related her own stories of having to begin in the broadcasting industry from "square one." In terms of percentage, I would say 50% of the people with whom I interact began their professional careers in the media from an entry-level point.

P. Madison:

Although I did not begin my career in broadcasting in an entry-level positions, most of the professional broadcasters whom I know started in entry-level positions such as production assistants and researchers.

Swanson:

I believe that most people in the broadcast industry have had similiar career paths in that they got their start in an entry-level position and then worked their way up the ladder.

VI. **Why EEO is needed to overcome "word-of-mouth" recruitment and the old boy network**

Cornwell:

It is important to remember that word-of-mouth recruitment is very significant in the broadcast industry. Intern and part-time positions are many times filled through in-house referrals and when full time positions become available, these "known" workers typically lead the recruitment list. Thus, if a company is not ethnically diverse at the outset, the word-of-mouth process can be detrimental to minorities seeking the full time jobs

Maddox-Dorsey:

I think that it's important to have as many specific recruitment programs in place to get information out to a broader range of people. Every attempt to bypass "the old boy network" should be applauded.

Perry:

The good-old-boy network is working, as usual, but it's working with a FCC-driven monitoring force. Without policing, employment opportunities would not exist for minorities and women. The industry has not encouraged minorities to apply for existing employment opportunities.

Murphy:

It has been very rare for our graduates to secure employment at stations that have not bothered to recruit them, because our students are not part of the old boy network. They have no way to know when a position becomes available, unless they learn of the opening because the company recruited with us.

Cruz:

There is not an easy flow of information about opportunities for different minority groups. Often they are isolated by their cultural background and their schools. The EEO policy is important for its impact on programming offered by stations and for providing minorities with knowledge of entry level positions for which they are qualified. It has, to some extent reduced the reliance of word-of-mouth recruiting.

J. Madison:

The lack of aggressive enforcement has impeded opportunities for minorities. Furthermore it has failed to reduce excessive reliance on old boys network which permeate the broadcasting culture. Indeed individuals with no experience are given on-air, prime positions in key time slots (two prominent, examples are Oliver North, (WRC), Danny McLain (WXYZT, Detroit) over and above African-American, Hispanic or other minorities who have been working at stations in designated weekend slots for years. The EEO policy helps to attract the best talent in a particular community, and not just the better connected. It provides opportunities for those who have not gained access to what has been essentially a word-of mouth, closed community.

Castro:

Most positions get filled so fast, that if a person does not know someone in the industry, without the outreach efforts, including notification, you are never going to find out about job openings. A promising person who is known by somebody, who knows the decision-makers, usually fills entry-level positions....Without this enforcement, I fear there would be a reversion to good old boy network. To quote Jesse Jackson, "people hire and do business with people they trust." ...However, in the 90's, the word has filtered through to young people that if they don't know someone in the industry, it is back to the way it used to be.

**VII. Why EEO enforcement should address  
"Second Generation" issues, such as working  
conditions and promotional opportunities**

Hughes:

I know a lot of people who are in the industry and are frustrated because many companies have an EEO policy written on paper that, in reality doesn't exist. I know of other people who are in companies that have very sophisticated EEO policies, but fall through the cracks because they become bogged down with the administration of that EEO program.

Perry:

Minorities being employed by a non-minority broadcast company, who seek a consistent paycheck are not comfortable with raising minority issues because of the threat of repressions or dismissal from employment.

Dilday:

In terms of retaining minorities, if they are given proper on-the-job conditions, equal promotion and advancement opportunities and equal pay, it is not difficult.

J. Madison:

I have seen the impact on friends' careers when they worked at stations with lack of genuine EEO compliance. They experienced minimum advancement, minimum job satisfaction and a great deal of frustration. They expressed that they were treated and looked upon as tokens and have no genuine opportunities to discuss and tackle these issues within these companies.

VIII. How EEO ought to work

A. Why EEO is critical in expanding the applicant pool

Henry:

Due to FCC enforcement, more minorities have been involved in broadcasting and have influenced a climate where you now have people more willing to seek positions in broadcasting.

Hughes:

It is fascinating to me that with the elimination of EEO enforcement, consolidation, and the shrinking of job opportunities, there doesn't seem to be any documented decrease in the number of minorities majoring and graduating from communications schools throughout the country. While the changes in EEO may not have affected the size of the job applicant pool, it certainly has affected the opportunities for the applicant pool to gain entry into the industry.... The industry itself is perceived as such an exciting and rewarding opportunity, the pool generates itself.

Schechter:

If minorities were encouraged to apply and were trained properly then they would have more of an incentive to work in the industry.

Winston:

Black owned broadcasters would be profoundly burdened by any cutback in EEO enforcement:

The pool size of African-American professionals available to us when we wish to hire experienced African-American managers for our stations will become even smaller than it is now.

The number of African-Americans with top management experience transferable to entrepreneurship will decline over time, yielding an even smaller pool of future African-American station owners.

B. Why it is not difficult to recruit minorities

Smulyan:

As an industry we are not good about recruiting people into the industry.

Cornwell:

I know that it is sometimes difficult to recruit minority candidates to certain locales-smaller towns, for instance. However, we have had success in our company in communities as small and cold as Duluth, Minnesota. Thus it is clear to us that one can be successful if one is willing to make the effort. Our managers have done just that.

Dilday:

Generating and retaining qualified minority applicants is not difficult. Once minorities are made aware of job opportunities they will apply for the positions. I would suspect that once you see that people want to hire you, you become interested in what they're doing. But once you think that there's no chance of you being hired, then you're not interested.

Davis:

It is so easy for broadcasters to say, "I would be willing to hire minorities if I could find one." I think this response is an excuse for not taking the right approach and taking the necessary steps to find minority applicants. Many jobs are not advertised. As a result people are unaware that jobs exist within the industry.

Maddox-Dorsey:

The ability of broadcasters to recruit and retain minority job applicants is directly related to the effort they put forth. While some broadcasters do put forth a lot of effort, many broadcasters simply do not attempt recruitment unless it is for on air staff at a black formatted station.

Cruz:

I know some broadcasters complain of a lack of interested applicants. This might be more of a function of their unwillingness to reach too far out from their immediate neighborhoods in their hiring efforts. Most broadcasters' headquarters are in affluent neighborhoods where there are few minority or low income people. If they tried to encompass all the communities of their audience, they would have no problems finding qualified minorities. The primary trouble is location and lack of effort.

J. Madison:

When I came to Washington, D.C. I was shocked when one programming director told me there were no qualified African-Americans to do talk radio. This was only four years ago! But in truth, it should be no more difficult to find and retain minority applicants than it is to obtain white applicants. As there is in fact no shortage of trained and trainable broadcasting talent in the African-American community. I think the facile statements made by hiring personnel reflects the ease with which one can eschew EEO responsibilities.

Castro:

A major concern for broadcasters is that they will have to "lower their standards" to hire minorities. This is unfounded. There is a lot of talent within our diverse communities....Recruitment can be difficult in large and small markets because people just don't know each other across racial and community lines. Recruitment can be a challenge if you are relying on peers or relationships for referrals.

C. Why mentoring and training are essential

J. Madison:

By improving hiring opportunities for minorities, EEO also makes it possible for individuals such as myself to provide mentoring to students and newcomers. I find that young minorities in the broadcasting profession would otherwise lack such a resource. Most of the White managers I know very seldom come into contact with minority youth. This is not due to prejudice on their part. They simply don't have cultural ties with the community. With a minority presence in broadcasting, aspiring professionals now have resources for advice and inspiration.

Winston:

Black owned broadcasters would be profoundly burdened by any cutback in EEOC enforcement... Nonminority broadcasters will have fewer incentives to train African-Americans and other minorities for broadcast careers. This responsibility--and the attendant costs--will fall even more heavily on Black owned broadcasters, who are already doing more than their share of this training.



Davis:

Over my 22 years in the business, I've found the FCC has tried to stimulate and motivate broadcasters to train and develop people. This is an area where EEO compliance exists in name more than in substance. The problem is that there is too much lip-service being applied to training and development. There is truly a shortage of good people, particularly in management and specialized areas. I think this shortage is due to the fact that broadcasters have not accepted the responsibility of complying with EEO in a conscientious way. There is far too much time spent trying to hire-away, from one another, those minorities who have already been recruited and trained. Consistently, majority owned broadcast companies are not making the investment of time and money to hire and train minorities. Minority broadcasters have traditionally been the companies who recruit, mentor and train minorities, only to have them hired away by well-financed, majority companies. Every broadcaster should be responsible for recruiting and developing a diverse group of employees, instead of using their resources to hire-away from those broadcasters that are willing to mentor and train minority applicants.

Hughes:

Many individuals, who have gone on to excel in the broadcasting industry, got their foot in the door because of some type of training program which fed directly into the EEO efforts of the broadcasters. Mentoring is important for growth in the broadcast business....Ninety percent of the people I have mentored come from the African-American communities. Mentoring, is considered by some, to be my number one passion. However, the industry, absolutely does not provide sufficient mentoring support for minorities and women.

Perry:

Prior to our ownership, which provided mentoring and creating opportunities for minorities, they had no place to train. Our universities were training them but they had no place to obtain on-the-job training. Eighty percent of the individuals I've mentored have been minorities.

Dates:

A cutback in FCC EEO enforcement will result in the disappearance of many of the best training opportunities presently open to Black broadcasting students. Inevitably, a cutback in internship opportunities will impose on the Black colleges considerable new burdens and costs attendant to providing in-house practicum experience.

Castro:

The only way to learn broadcasting is to be in the industry. To become a skilled person in the industry, you have to be given an opportunity to sharpen your skills. This true for on-air talent, administration and in sales. On-the-job training is necessary to provide mentoring and the chance work with highly skilled people....Many formal opportunities for mentoring have disappeared or been cut back significantly. The industry should do infinitely more, on a volunteer basis, to mentor and support.

Schechter:

On the issue of training and mentoring, minorities often do not have the opportunities and resources as their white counterparts. They receive little encouragement from others in the industry. Unfortunately, the people in the industry do not offer sufficient opportunities for mentoring, and at times if a minority asks for support they seldom receive it; the process is very intimidating. The industry needs to do a better job of supporting the efforts of minorities entering the field.

Cruz:

As my career progressed, there were very few Hispanic role models available to me. It was disheartening from a mentoring standpoint, because there weren't that many people I could look up to as far as examples of what I'd hoped to achieve. That did not make me less of a hard worker, but there is a positive effect to having mentors of the same culture and ethnic group, who have been able to surmount obstacles and might have a strategy as to how to deal with them. ... When there is an absence of role models one realizes the impact. So now, I have been, and will be, the role model for others. Perhaps this will have a positive impact on their careers.

P. Madison:

I have personally mentored, trained and supported hundreds of minorities during the course of my professional career.

Swanson:

I have helped a number of people in this industry over the forty years I have been involved in it. Many have been minorities. Some had the advantage of other training and educational opportunities while some did not. I think we all have some obligation to help others just as there were those who helped or assisted us along the way.

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